

EXHIBIT A

Nasri Hage

From: Jennifer B. Maisel
Sent: Thursday, June 5, 2025 9:35 AM
To: Edward A. Bayley; openaicopyrightlitigation.lwteam@lw.com;
openaicopyright@mofo.com; KVP-OAI
Cc: newsplaintiffs-service@simplelists.susmangodfrey.com
Subject: RE: OpenAI Output Log Preservation - Sampling Order

Dear Ed,

I am quite sure the Court did not contemplate that you submit a proposal without our comments and input. As you know, the Court appreciates, and requires, meeting and conferring on every dispute.

Please send us your draft proposal now so that we may review it and discuss it with our experts.

Thanks,

Jen



Jennifer Maisel (she/her)
Rothwell, Figg, Ernst & Manbeck, P.C.
901 New York Avenue, N.W.
Suite 900 East
Washington, D.C. 20001

Main Number: 202.783.6040
Direct Number: 202.626.3548
Fax Number: 202.783.6031
Email: jmaisel@rothwellfigg.com
Website: www.rothwellfigg.com

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From: Edward A. Bayley <EBayley@keker.com>
Sent: Thursday, June 5, 2025 2:19 AM
To: Jennifer B. Maisel <jmaisel@rothwellfigg.com>; openaicopyrightlitigation.lwteam@lw.com;
openaicopyright@mofo.com; KVP-OAI <KVPOAI@keker.com>
Cc: newsplaintiffs-service@simplelists.susmangodfrey.com
Subject: RE: OpenAI Output Log Preservation - Sampling Order

Jen,

OpenAI intends to follow the Court's order as written and "submit a proposed order regarding the specific sampling process, consistent with the discussion on the record, by June 6, 2025," so that the parties can proceed with the sampling process in an expeditious manner. While we are happy as always to meet and confer, the Court's order does not contemplate the submission of a joint proposal.

Regards,

-Ed

Edward A. Bayley

Keker, Van Nest & Peters LLP
633 Battery Street
San Francisco, CA 94111-1809
415 773 6672 direct | 415 391 5400 main
ebayley@keker.com | [vcard](#) | [keker.com](#)

From: Jennifer B. Maisel <jmaisel@rothwellfigg.com>

Sent: Tuesday, June 3, 2025 10:17 AM

To: openaicopyrightlitigation.lwteam@lw.com; openaicopyright@mofo.com; KVP-OAI <KVPOAI@keker.com>

Cc: newsplaintiffs-service@simplelists.susmangodfrey.com

Subject: OpenAI Output Log Preservation - Sampling Order

[EXTERNAL]

Counsel,

Paragraph 2 of Magistrate Judge Wang's May 30th order regarding preservation of OpenAI's output log data (*Times* Dkt. 589) directs OpenAI to submit a proposed order regarding the sampling of the 30-day tables of consumer output log data. Please provide us with OpenAI's proposal no later than the close of business tomorrow, May 4, so that News Plaintiffs may review and the parties have an opportunity to meet and confer as needed in advance of the submission.

Best regards,
Jen



ROTHWELL FIGG

Jennifer Maisel (she/her)

Rothwell, Figg, Ernst & Manbeck, P.C.
901 New York Avenue, N.W.
Suite 900 East
Washington, D.C. 20001

Main Number: 202.783.6040

Direct Number: 202.626.3548

Fax Number: 202.783.6031

Email: jmaisel@rothwellfigg.com

Website: www.rothwellfigg.com

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